

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In re:

Daryl Fred Heller

Debtor.

Chapter 11

Case No. 25-11354 (JNP)

**LIMITED OBJECTION TO MOTION OF ACCORDO LIMITED PARTNERSHIP FOR
AN ORDER AUTHORIZING THE SALE OF REAL PROPERTY LOCATED AT 415
NORTH PRINCE STREET, UNITS 2, 3, 4/6, AND 5/7, LANCASTER, PENNSYLVANIA
PURSUANT TO THE MARCH 14, 2025 AMENDED CONSENT ORDER
PRESERVING STATUS QUO**

Deerfield Capital, LLC (“Deerfield” or “Movant”) asserts the following Limited Objection to the entry of an order authorizing Accordo Limited Partnership (“Accordo”) to sell the real property located at 415 N. Prince Street, Units 2, 3, 4/6 and 5/7, Lancaster, Pennsylvania (the “Property”) and in support thereof avers as follows:

1. Deerfield Capital, LLC (“Deerfield”) is a limited liability company formed and operating in the Commonwealth of Pennsylvania, with a mailing address of 16 Deerfield Road, Lancaster, PA 17603. Deerfield is a secured creditor of the Debtor.
2. Deerfield does not object to the sale of the Property or the payment of any secured creditors or closing costs in order to effectuate the sale of the Property.
3. Deerfield does object to the distribution of any of the balance of the sale proceeds, including, but not limited to, the distributions to reputed owners and the funds to “wind-up the

operations and dissolve the Seller and Premier REG. To be clear, Deerfield objects to any distribution to either Premier Real Estate Group, LLC ("Premier REG"), Accordo, or Robert Z. Horst ("Horst").

4. Deerfield has filed a separate adversary action against Accordo and other parties with regard to alleged fraudulent transfers that involve the Debtor.

5. On or about March 14, 2025, this Court entered a Consent Order preserving the Status Quo (the "Status Quo Order"). *See* D.N. 119.

6. The purpose of the Status Quo Order was to prevent the distribution of **any** proceeds absent further Court Order to ensure that parties have a valid and legal claim.

7. As such, Deerfield reserves all rights, remedies, and claims, including, but not limited, to any proceeds owed or sought to be distributed to any party.

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By: 

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